

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

)	
CHRISTOPHER NEALEY;)	
BRIANNA WILSON NEALEY,)	
)	
PLAINTIFF,)	
)	
v.)	2:19-cv-01419-JHE
)	UNOPPOSED
EXETER FINANCE, LLC.; DEL)	
MAR RECOVERY SOLUTIONS,)	
INC.,)	
)	
DEFENDANTS.)	

MOTION FOR LEAVE TO AMEND COMPLAINT

COME NOW the Plaintiffs and move the Court for Leave to Amend the Complaint previously filed, and as grounds for said Motion, states as follows:

1. Plaintiffs filed the original Complaint in the above styled matter on August 29, 2019 .
2. Plaintiff seeks to add an additional Defendant **Twenty 4 Seven Recovery, Inc.**
3. The Amendment of the Complaint does not change or alter the facts of the case.

4. The Amendment of the Complaint does not change or alter the discovery deadlines set by the court for this case.
5. The Amendment of the Complaint will in no way change the scheduling order for this case.
6. The Amendment of the Complaint shall in no way prejudice the Defendants in this case and will be in the interest of justice.
7. Attached hereto and marked as Exhibit A is a copy of the proposed First Amendment to the Complaint.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request this Court to enter an order granting Plaintiffs Motion for Leave to Amend and for such other and further relief as this Court deems necessary and proper.

/s/ W. Whitney Seals
W. Whitney Seals
Attorney for Plaintiff

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on this the 21 October 2019, the foregoing is electronically filed with the Clerk of the Court using the CM/ECF system, the CM/ECF system will send notification of such filing to the following: :

John W. Johnson, II
CHRISTIAN & SMALL, LLP
505 20th Street North
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jwjohnson@csattorneys.com

and I hereby certified that I have mailed the foregoing document by U.S. Mail, postage prepaid, to the following:

TWENTY-FOUR 7 RECOVERY, INC.
C/O Reg. Agt. Nick Keeton
P.O. Box 2010
Carbon Hill, AL 35549

/s/W. Whitney Seals

OF COUNSEL